
From: Ann Coren <anncoren@hotmail.com>
Sent: Wednesday, February 26, 2025 5:08 PM
To: CouncilMail
Subject: CB11-2025 concerns

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Dear Council Members Jones, Jung, Rigby, Walsh, Yungmann,

I am Ann Coren, a 44-year resident of Howard County, formerly in Owen Brown, and now residing in the Hickory Crest Community in Hickory Ridge, approximately 1.5 miles from WR Grace.

I was going to write to support CB-11-2025, but now I understand that the more relevant issue is that CB11-2025's wording makes it a 'Special Law' that would likely incur lawsuits for the County. Therefore, I am requesting that CB11 be re-written to be more general, to protect all Howard County residents from future toxin releasing Research & Development or manufacturing. While we need jobs in Howard County, I believe that we can have those jobs without poisoning our air and water.

I am a retired Montgomery County Chemistry Teacher and as such am looking at the WR Grace testimony with a chemist's eye.

My heart goes out to the employees of WR Grace. I was a part of the Green Chemistry movement in the 1980's. I see in them the enthusiasm to solve the plastics problem with recycling, an enthusiasm I no longer share as I see the toxins and microplastics increase. There is nothing safe about plastics, as research on health impacts becomes increasingly abundant. See the work of Consumer Reports, The Environmental Working Group, and PIRG amongst others.

I hear that Councilperson Rigby is concerned about CB11-2025 opening the County to probable lawsuits from WR Grace due to the likelihood that this would be considered a Special Law. There must be another way to approach this. Surely residents who do not feel protected by the County from environmental harm might also bring lawsuits against the County as ailments increase. It is a strong coalition opposing R&D in residential neighborhoods.

I taught my student to ask good questions. I think the question before us now is how do we protect our citizens, now and in the future, keeping Howard County a desirable place to live?

In terms of environmental safety, the most important question you can ask right now is 'What is WR Grace NOT telling you?' From hearing the testimony over two evenings, there is no doubt that the current WR Grace Facility is emitting stuff. The residents in proximity report noxious smells and noise pollution. What are they smelling? How far do these toxins travel. You need to know what a chemical's structure is to test for it. ? The County cannot regulate what it cannot monitor. It cannot monitor industrial secrets. That puts the residents at risk. Can something be put into legislation to the effect that all materials vented into the air of the County be monitorable and maintained at whatever is determined by health scientists to be safe levels, like we do with fluoride in the water?

Air is indiscriminate. Whether it settles down on the surrounding Ceder Creek community or blows a mile and a half away (I am downwind of the prevailing winds), it is disbursed, diluted, but still present. At what level is this unknowable material toxic? Parts per million? Parts per billion? Parts per trillion? Ask yourself why you can't bring a 3-ounce container of liquid into an airport. Small amounts can be very toxic.

I fear that this plant sets a precedent for the County's position on safety of residents versus fear of lawsuits. Safety increases property values and brings more revenue to the County. In a downward safety trend, if fear drives people away from the area, River Hill and Hickory Ridge will be affected first, then as word gets out, people will be less inclined to buy property in Howard County for fear of the toxins and possible fires and explosions that such R&D can bring. Re-write CB11-2025 please! Design a legal County wide statute!

Just ask the people living and farming near the Moss Landing fire in California if they think experimental facilities are safe. My daughter, who lives in Santa Cruz, 18 miles away, had to evacuate. Yeah, I know, it's not on the same scale, micro chemistry versus industrial, but what are the products? Are they toxic? At what concentration can they cause harm?

As our representatives, you are at a crossroads. You can choose to make this a residential County with 'clean' industry, or you can make it a manufacturing County. Please choose our path carefully, there is no going back once land, water, and air are polluted.

Howard County is already experiencing difficulties due to the firing of Federal Employees. Do you really want to let something into our County that will bring more economic stress and fear of safety to our residents?

Please rework CB11-2025. Please do not let this issue drop.

Thank you.

Ann Coren, 6424 Hickory Overlook, Columbia MD 21044.

Cell: 443-803-7990

From: Williams, China
Sent: Wednesday, February 26, 2025 4:15 PM
To: Anderson, Isaiah
Subject: FW: Community Member requesting Support for CB-11
Attachments: Reasons to vote Yes to CB11-2025.pdf; Community Response to Grace Letter.pdf

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From: Padma Swamy <padma.swamy@gmail.com>
Sent: Wednesday, February 26, 2025 3:37 PM
To: CouncilDistrict4@howardcountymd.gov
Subject: Community Member requesting Support for CB-11

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Dear Ms. Jung,

As a Cedar Creek Resident, I am so incredibly thankful for your advocacy and help with CB11-2025. I am a pediatrician and I worry about the impact of this facility on lung health, development and overall child well-being. As community members we have created this document with data to support why this pilot plant is so dangerous, and also a letter to counter WR Grace's claims that this facility will not cause harm. I am sending these documents to you as well so that you have them. I am also sending this to the other council members so that they are aware of the risk. Again, thank you for your support of CB11-2025.

Thanks,
Padma Swamy

Dear County Council Members,

Thank you for your attention to the grave concern of residents regarding the W.R. Grace Pilot Project. The Cedar Creek Community has summarized key findings and evidence as to why advanced recycling is not safe near residential homes, which has been endorsed **unanimously by the Howard County Planning Board** for your immediate review. We have also included flaws in Grace's permit application. **You will find many reasons below to vote YES to CB11-2025 to protect public health and stand behind your constituents.**

Unanimous Recommendation from Howard County Department of Planning & Zoning

1. **Howard County Department of Planning & Zoning Recommendation:** DPZ reviewed all the facts and the 3 board members **unanimously** recommended for the Council to come up with legislation/amendments for the project not to be implemented so close to residential homes due to the potential hazards/risk of fire, leaks, and explosions. Board Member James Cecil testified for a bill presented by Senator Clarence Lam regarding rendering a tax credit to residents impacted by the pilot plant, and he suggested that the state should instead use the money contemplated for the tax credit to move the project to M-1, M-2 Districts.

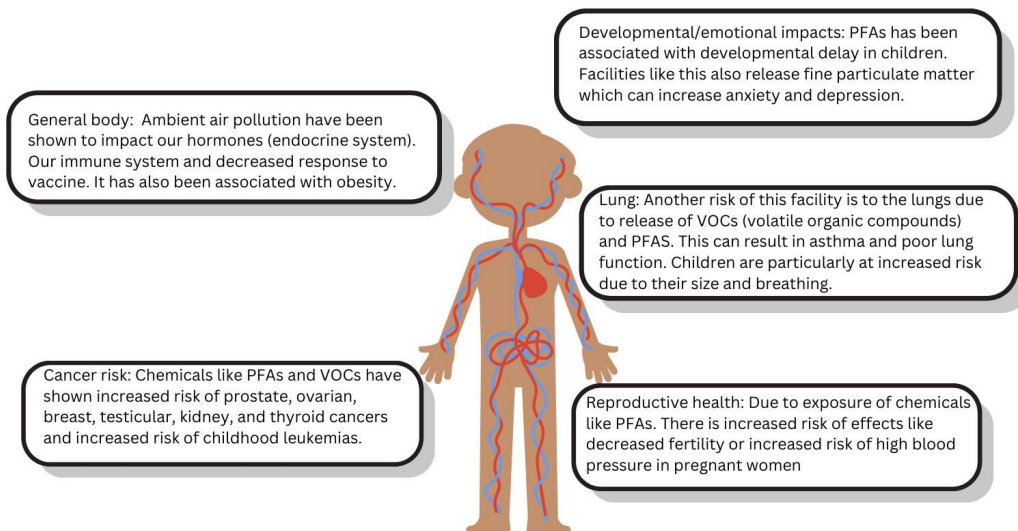
Flaws in Grace's Recycling Claims

2. **Recycling Misconception:** The industry promotes chemical recycling as a solution to plastic waste, but it is often just a way to **greenwash** incineration ([NRDC](#), 2022, p. 1; [Beyond Plastics](#), 2025)
3. **EPA regulations define pyrolysis units as incinerators:** The EPA stated in a letter to the Maryland Department of the Environment that the W.R. Grace Pilot Plant "would meet the definition of an [Other Solid Waste Incinerator](#), as OSWI expressly includes pyrolysis units" (U.S. Environmental Protection Agency, Region 3. (2025, January 8). Applicability Determination Request - OSWI Rule and Proposed Pilot Plant in Maryland [Letter to Suna Yi Sariscak, Maryland Department of the Environment].).
4. **Energy Recovery:** Burning plastic for fuel (plastic-to-fuel) does not count as **recycling** by international standards, as it generates the same harmful pollutants as fossil fuels ([NRDC](#), 2022, p. 3).[HOWARD COUNTY ZONING REGULATIONS | Zoning | Howard County, MD | Municode Library](#)

Health and Environment Concerns of Plastic Incineration

5. **Health Risks:** The chemicals released or disposed of by these facilities are highly toxic, with many being **carcinogenic, neurotoxic, or reproductive toxicants**. For instance, **VOC's** are among the substances that pose severe health risks, including cancer and developmental harm ([NRDC](#), 2022, p. 5,6) ([Dragon](#) et al. 2023) ([Smolker](#) et al, 2024) ([Brumberg et al. 2021](#)) ([EPA 2024](#)) ([American Lung Association 2024](#))

How Outdoor Air Pollutants Impact our Health



Citations:

1. [Brumberg et al. 2021](#): Ambient Air Pollution: Health Hazards to Children
2. [EPA 2024](#) Our Current Understanding of the Human Health and Environmental Risks of PFAS
3. [American Lung Association 2024](#) Volatile Organic Compounds
4. [Dragon et al 2023](#). Perfluoroalkyl Substances (PFAS) Affect Inflammation in Lung Cells and Tissues

6. **Hazardous Waste:** Most "chemical recycling" facilities in the U.S. are **not recycling plastic**, and instead, generate **hazardous waste** that is often incinerated ([NRDC](#), 2022, p. 3, 4; [Beyond Plastics](#), 2025).
7. **Air Pollution:** "Chemical recycling" facilities are known to release **hazardous air pollutants** like styrene, toluene, and dioxins. These pollutants are linked to serious health issues such as **cancer, birth defects, and respiratory problems** ([NRDC](#), 2022, p. 5,6; [Beyond Plastics](#), 2025).
8. **Polymer Burning Evidence in Grace's Own MDE Application:** Grace will burn 2,588 kg/yr of polymer following a gasification step in the reactor as indicated in their permit application. In addition, burning will also take place in the catalyst regeneration unit. (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 29 and p. 16, respectively).
9. **Harmful Chemicals:** About 16,000 chemical additives are used in making plastics. More than a quarter (4,200) of these chemicals are known to be harmful to human health and/or the environment while even more have not yet been studied ([PlastChem](#), 2024).

10. **Increased Risk as a Pilot Plant:** A study looking at health impacts on a similar facility concluded that hazards of a pilot-plant can be greater than those of a production plant, since pilot-plants are operated to test different process conditions, far from the optimized ones. ([Paladino et al, 2021](#)).

Flaws in Grace's Claims that R&D Emissions will be Negligible

11. **An Independent Scientific Review Conducted for Maryland House of Delegates Concluded that Emissions Are Likely Greater than Stated by Grace:** Grace has strongly denied that there will be any emissions of PFAS, benzene, or other chemicals that residents have expressed concern about. However, **according to an independent chemical engineer, Dave Arndt who reviewed Grace's permit application for Maryland State Delegate [Jennifer R. Terrasa](#)**, *"W.R. Grace has stated that the materials that they are going to feed into their reactor are "hard to recycle" plastics, resin identification code 1-7. These plastics have been found to include the following items which have been documented to be released in incineration emissions: PFAS, Bisphenols, Phthalates, Chlorine, Florine, Lead, Cadmium, Selenium, Benzene, 1,2-dichloroethane, Chromium, Vinyl chloride, Barium, Styrene, Benzene, Toluene, Mercury, Arsenic, Dioxins, Ethyl benzene, Xylenes, Naphthalene, Acetaldehyde, Formaldehyde, Hydrochloric acid, Methanol, Hexane and PM2.5. Please note that this is not an all-inclusive list, there may be other compounds released depending on the plastic feedstock being used."* The above findings by Mr. Arndt are consistent with a near-unanimous consensus among the scientific community, all of which identify many of the above emissions as probable byproducts from similar incineration/pyrolysis operations.
12. **Grace's MDE Application Uses One Polymer as its Benchmark Feedstock for Emission Calculation Purposes, While Acknowledging that It May Use Several "Other" Polymers:** Grace says that its MDE application is focused on homogeneous polypropylene (*"The proposed Project is designed to process 1 kg/hr of commercially available plastic pellet feedstock (the benchmark feedstock can be 100% homogeneous polypropylene (PP))"*) but acknowledges the intention to use several other polymers as feedstock (*"However, a typical mixed plastic also can include low density polyethylene (LDPE), high density polyethylene (HDPE), polyethylene terephthalate (PET), polystyrene (PS), polyvinyl chloride (PVC), and others"*). The use of the term "others" in the list of polymers is a major concern, as it would open the door for Grace to include any type of polymer imaginable and potentially produce new kinds of emissions that are not contemplated in the initial report. (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 15).
13. **Chemical Recycling Facilities Release Pollutants that Can be Dangerous Regardless of R&D Size and Scale:** Even small R&D facilities release pollutants, and many of these pollutants (like benzene, dioxins, and VOCs) are harmful even in small amounts and have no safe threshold for exposure. According to Dave Arndt, the chemical engineer who reviewed Grace's permit application for Maryland State Delegate [Jennifer R. Terrasa](#), *"W.R. Grace only presents that 0.218 lb of VOCs will be emitted daily, however [they] don't give the chemical make-up of the VOCs being emitted. Some*

VOCs are highly carcinogenic and even at that volume should not be release[d] to the public.”

Grace’s Regulatory Non-Compliance and Application Omissions

14. **Failure to Comply with the Clean Air Act:** As discussed earlier, Grace’s pyrolysis unit is classified as an “Other Solid Waste Incinerator.” [Federal Clean Air Act Section 129](#) addresses emissions from solid waste combustion, and incinerators are regulated under the Clean Air Act’s incinerator provision, [Section 7429](#). There is no mention of compliance with Sections 129 or 7429 of the Federal Clean Air Act in [Grace’s application](#) or MDE’s tentative determination for the permit. Both the text and legislative history of the Clean Air Act indicate that Congress intended Section 7429 to cover all facilities that combust solid waste, except those expressly exempted by Congress. Since Congress did not expressly exempt small units combusting plastic and other wastes from the Clean Air Act, they are still covered by the Act and need a Section 129 Clean Air Act permit. Indeed, subsequent court decisions have affirmed that Congress did intend to regulate these small facilities burning waste. [See *Sierra Club v. EPA*, 167 F.3d 658, 662 (D.C. Cir. 1999)].
15. **Permit Docket 16-23 and the Analysis of the Risks Focused on the Most Conservative Use Case W.R. Grace Will Conduct While W.R. Grace’s True Operation Are Expected to Scale Up and Experiment with Different Applications Beyond Those Identified in the Initial Application:** W.R. Grace makes various assumptions under their permit application while admitting that they may experiment with, or expand on, many fundamental elements in the permit. For example, they suggest 2.2lbs of plastic will be incinerated per hour while having no restrictions from increasing that amount. They also identify one type of homogeneous feedstock with allegedly less serious emissions concerns, while affording them unlimited latitude to expand the types of feedstocks used or the volumes to be used (all without oversight or restriction) based on the broad catch-all language in the permit to use “other types” as well ([see Section 11 in Permit Docket 16-23](#)). Grace’s identification of a “happy path” for purposes of obtaining the permit while using umbrella terms allowing them to expand without oversight or restriction is hugely concerning and should be expected (if the permit is approved on the condition that no expansion in the volume or application of uses be permitted beyond the exact types/quantities identified in the permit. W.R. Grace would surely object, as they’ve acknowledged such expansions are likely). (Testimony of Scott Purnell, VP of R&D- Refining Technologies at W.R. Grace & Co. February 19th, 2025).
16. **Zoning Non-Compliance:** Since the plant is established as an incineration facility, then the Zoning regulations of Howard County preclude the facility to be located in a PEC District. Bill No. 17-2021(ZRA-197), § 1, 5-6-2021; Bill No. 39-2023(ZRA-204), § 1, 11-6-2023) The Solid Waste District permits processing facilities for non-hazardous solid waste which are not covered elsewhere in the Zoning Regulations, while requiring detailed review of each proposal to evaluate its land use impacts and its potential contribution to the County’s solid waste management system. **Because many solid waste processing facilities are of a heavy industrial nature, the SW District is an**

overlay district which may be applied only to land in the M-2 District. [HOWARD COUNTY ZONING REGULATIONS](#)

17. **Grace's Emission Numbers Ignore Contributions from Several Factors, including:** Early plant trials; operation outside of steady-state (e.g. start-ups, shutdowns); catalyst regenerator venting; leaks; fugitive emissions; and accidents.
18. **Flaws in Grace's Environmental Justice Report:** Grace's Environmental Justice (EJ) report indicates that there are no high schools, grocery stores, or land restoration facilities within Census Tract 6055.05, Howard County, Maryland (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 9). However, public maps confirm that River Hill High School, the River Hill Shopping Center, and the Forest Retention Area on the property line between Cedar Creek and Grace all fall within this tract.
19. **Regulatory Concerns:** Many facilities are not subject to stringent regulations because some states have sought to reclassify chemical recycling as a non-solid waste facility, reducing oversight ([NRDC](#), 2022, p.7,8). MDE's grant funding from the federal government to oversee an operation like Grace's plant has been eliminated ([WYPR](#), 2025).

Safety Concerns

20. **Incidents of Fires:** Two advanced recycling plants, **New Hope Energy** and **Brightmark**, experienced **fires** within the first year of operation, highlighting the potential safety hazards ([NRDC](#), 2022, p.8).
21. **Grace's Application Indicates there will be Fuel Storage and Transfer, which Increases Fire and Accident Risk:** Grace will be regularly producing, warehousing, and transporting multiple 55-gal drums of fuel and shipped to a third party waste treatment facility (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 16). This is not accurate reporting. Every drop needs to be accounted for, plus shipment dates and times, method of shipment and name of the treatment facility must be documented. Therefore, a hazardous liquid permit must also be obtained.
22. **Documented Accidents Involving the use of Pyrolysis Reactors and Thermal Oxidizers:** These include Husky Energy Refinery in 2018 in Superior, WI ([36 workers injured, 39,000 lb. of flammable hydrocarbons released](#)) and Exxon-Mobil in 2018 in Torrance, CA ([four contractors were injured, neighborhood was dusted with a coat of ash](#)).
23. **Exempt from Emergency Planning and Community Right-to-Know Act (EPCRA):** [EPCRA](#) enhances **public safety** by ensuring first responders and communities have critical information to prevent and manage hazardous incidents, reducing risks to human health and the environment. However, this facility's classification as a research and development facility (NAICS code [541715](#)) exempts Grace from much of this reporting.

Effects on Minorities, Low-Income Households, and Children:

24. **Environmental Justice Issues:** Many advanced recycling facilities are located in communities with a high percentage of **low-income** residents and **people of color** (NRDC, 2022, p. 7, Beyond Plastics, 2025). **The Environmental Justice (EJ) score of**

29% indicated in Grace’s MDE application is understated and misleading, as it does not include groups of minorities and low-income households who moved into residential communities adjacent to Grace after the 2020 census. The 2020 census indicates a 54.33% minority population per Grace’s EJ report (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 11). However, we believe as many as 80% of residents in Cedar Creek, all of whom moved in after the 2020 census, are people of color. Additionally, **Robinson Overlook Apartments, an affordable housing community adjacent to Grace’s headquarters, only opened in August 2021** ([Woda Cooper Companies](#), 2021). **Outreach from Cedar Creek residents confirmed that Robinson Overlook residents are unaware of Grace’s plans.**

25. **Growing Children in the Community:** The Cedar Creek neighborhood consists of 100+ children. Children breathe more air relative to their body weight than adults, breathing in 2 to 3 times as much air per minute, making them more susceptible to harmful air pollution ([Unicef](#), 2019).

Benefits Do Not Outweigh Risks:

26. **Current Evidence Suggests Benefits of Projects like Grace’s are Overstated:** Of 11 constructed chemical recycling facilities in the U.S., two of these facilities closed in the first half of 2024: Regenyx in Oregon and Fulcrum in Nevada. Most of the remaining nine facilities are not operating at full capacity. Even if they were operating at full capacity, the remaining nine facilities could only process 1.2% of all U.S. plastic waste ([Beyond Plastics](#), 2025). More concerning, a study published by the [Federal Governments Renewable Energy Lab](#), found that chemical recycling was actually 10-100 times worse for the environment than simply producing new, virgin plastic.
27. **Hours of Facility Operation Increase Risks:** The plant will operate 16 hours a day (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 16), five days a week, all year round, potentially for many years. The long-term cumulative effects of this persistent exposure on the health of children and adults residing just yards from the facility are unknown, but remain a major concern.
28. **Grace Has a Documented History of Contaminating this Location with Hazardous Waste, Suggesting this Project Carries Elevated Risks:** There is a public report on the [EPA’s website](#) describing the efforts to clean-up environmental pollutants around Grace’s headquarters. According to the EPA, “*The contaminants of concern include trichloroethene (TCE), 1,1,2,2-tetrachloroethane, tetrachloroethene, 1,1-dichloroethene, 1,1-dichloroethane, 1,2-dichloroethane, and trichlorofluoromethane.*”

Howard County’s mission includes striving to be a place with safe and healthy communities. Vetoing or tabling CB11-2025, and allowing WR Grace to build this facility, will cause irreparable HARM to our community and surrounding communities. This includes health impacts to our children and elderly, safety impacts from possible leaks/fires/explosions, and environmental justice impacts to resources like Robinson Nature Preserve. The Howard County Planning Board unanimously approved the proposed ZRA-211 as they were concerned about the impacts to the community.

As constituents and members of the Howard County community, we trust you to uphold the county's values to do the right thing and we urge you to vote YES for CB11-2025 on March 3rd, 2025. Our families are

Thank you!

Sincerely,

Cedar Creek Residents

Dear Howard County Councilmembers,

Thank you for your attention to the public's concerns about the Grace pilot project. **As Howard County residents, we have been made aware of a recent letter sent to you by Grace. Their letter is based on fictitious and not real data. Please see below for a point-by-point rebuttal which contains factual counter-points to each of the company's claims to you.** Our comments are in **red**.

- **Grace will not burn or incinerate plastic.**

- Grace Contention: We have invented a new process of catalytic chemical conversion to break down plastic pellets using a chemical catalyst under heat and pressure; that process does not involve a fire or a flame.

Community Response: This is neither a new invention, nor a new process. What Grace describes in so many words is just pyrolysis by definition. Eight companies are already doing this commercially in the US, and polluting the environment ([NRDC, 2022, p. 3](#)). The report of char (burnt material) on the table in page 29 of the MDE application (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#)) reveals that some burning is still taking place in the reactor.

It is also important to note that *EPA regulations define pyrolysis units as incinerators*. The EPA stated in a letter dated January 8, 2025 to the Maryland Department of the Environment that the W.R. Grace Pilot Plant “would meet the definition of an [Other Solid Waste Incinerator](#), as OSWI expressly includes pyrolysis units” (U.S. Environmental Protection Agency, Region 3. (2025, January 8). Applicability Determination Request - OSWI Rule and Proposed Pilot Plant in Maryland [Letter to Suna Yi Sariscak, Maryland Department of the Environment].).

- Grace Contention: We plan to use a Flameless Thermal Oxidizer, a state-of-the-art emissions control device, to help safely manage the output of our chemical process by “oxidizing” it into CO₂ and water.

Community Response: By definition, a Flameless Thermal Oxidizer is an incinerator. This is a combustion process: the carbon-based feed is made to react with oxygen under sufficient energy, in this case the 1,800 deg F in the unit. Output of the process is CO₂, water, and heat, i.e., combustion products. An external flame is not necessary, because the material "auto-ignites" at the high temperature of the unit.

Burning is also taking place in the catalyst regenerator unit. The flue gas that is vented out consists of combustion products and other pollutants.

Additional burning appears to take place in the pyrolysis reactor itself, as evidenced by the 3.3% char formation (132 kg of char per year divided by 4,000 kg of plastic pellet feedstock on page 29 of the [MDE application](#)).

- **Grace has developed a new plastic recycling process technology that we wish to pilot.**

- Grace Contention: This technology is not the “same old pyrolysis technology that has not worked for 40 years.”

Community Response It is easy to make a statement like this without providing any details. The chemistry described in the MDE application and in the patents we have reviewed is, in essence, the same pyrolysis technology described in textbooks.

- Grace Contention: Grace has applied for at least six patents related to this new process.

Community Response: The process described in the MDE application and in US patent application #20240425769 and others from Grace still use the same pyrolysis/purification/incineration processes described elsewhere. Further, the levels of gas emissions, solid waste, and risks for accidents are high, and not different from what others are doing.

- **There will be no benzene as an input or output of this process.**

- Grace Contention: On MDE Form 5T, “Toxic Air Pollutant (TAP) Emissions Summary and Compliance Demonstration,” which is included with the air permit application, “ethanol” and “benzene” are pre-populated as examples of pollutants.

Community Response: It is true that Grace’s air permit application does not actually state benzene will be produced. However, according to an independent chemical engineer, Dave Arndt who reviewed Grace’s permit application for Maryland State Delegate [Jennifer R. Terrasa](#), “W.R. Grace has stated that the materials that they are going to feed into their reactor are “hard to recycle” plastics, resin identification code 1-7. These plastics have been found to include the following items which have been documented to be released in incineration emissions: **PFAS**, Bisphenols, Phthalates, Chlorine, Florine, Lead, Cadmium, Selenium, **Benzene**, 1,2-dichloroethane, Chromium, Vinyl chloride, Barium, Styrene, Toluene, Mercury, Arsenic, Dioxins, **Ethyl benzene**, Xylenes, Naphthalene, Acetaldehyde, Formaldehyde, Hydrochloric acid, Methanol, Hexane and PM2.5. Please note that this is not an all-inclusive list, there may be other compounds released depending on the plastic feedstock being used.” The above findings by Mr. Arndt are consistent with a **near-unanimous consensus among the scientific community, all of which identify many of the above emissions as probable byproducts from similar incineration/pyrolysis operations.**

- **Grace plans to take steps to help assure there will be no PFAS in the air emissions.***

- Grace Contention: The virgin plastic pellets intended for initial studies will be sourced directly from manufacturers and will not contain intentionally-added PFAS. Treated material streams from established recycling facilities intended for later process development have the potential to contain PFAS due to the ubiquitous presence of these chemicals. Grace will use appropriate analytical testing, based on published methods, to measure the total fluorine content of all feedstock, will conservatively assume that all fluorine is due to the presence of

PFAS, and will only use feedstock for which the fluorine content is below trace levels.

Community Response: Fluorine present in ANY of the process chemical, not just the polymers, has the potential of forming PFAS compounds during incineration. It is also concerning that Grace says "initial" studies will not contain intentionally-added PFAS, but leaves the door open for subsequent studies.

Additionally, see the point above about benzene, PFAS, and other probable byproducts from pyrolysis.

- **The air emissions from this research unit are very small.*** ○ Grace Contention: The CO₂ emissions per day included in Grace's permit application are equivalent to less than the CO₂ emissions from 4 gallons of gasoline, based on US EPA data for CO₂ emissions per gallon of fuel for an average passenger vehicle.

- Grace Contention: NO_x emissions per day included in Grace's permit application are equivalent to an average US vehicle driving roughly 10 miles, based on 2024 BTS (Bureau of Transportation Statistics) data for average vehicle emissions in the US fleet.

Community Response: Not all emission sources are included in Grace's calculations. In addition to the incinerator, there will be emissions from spills, leaks, fugitive sources, trials, startups, shutdowns, etc. Also a key flaw with Grace's argument (and other arguments below) is that car emissions dissipate and are diluted in the air as they travel, whereas the pilot plant's emissions are happening literally in the backyard of some neighbors almost constantly (16 hours a day for years to come). Nobody sits near a car with an engine running for 16 hours a day, for years to come. The long-term health effects of this near-constant exposure cannot be good for either grown-ups and children.

- Grace Contention: CO emissions per day included in Grace's permit application are equivalent to an average US vehicle driving about 0.2 miles, based on 2024 BTS (Bureau of Transportation Statistics) data for average vehicle emissions.

Community Response: Please see our reply above.

- Grace Contention: Maryland Law limits VOC content of flat coatings (e.g. paints) to 50 g/l, and non-flat coatings to 100 g/l. (Maryland Register Reference: 26.11.39.0026.11.39.9999). Using these standards, VOC emissions per day included in Grace's permit application are equivalent to the maximum VOCs contained in about one-quarter to one-half gallon of paint.

Community Response: This is the same flawed argument as that in the car comparison above. VOCs emissions will actually be breathed by residents 16 hours a day, almost nonstop for years to come. Nobody will sit next to a gallon of paint breathing its fumes for hours a day, for years to come.

Additionally, according to Dave Arndt, the chemical engineer who reviewed Grace's permit application for Maryland State Delegate Jennifer R. Terrasa, "W.R. Grace only presents that 0.218 lb of VOCs will be emitted daily, however

[they] don't give the chemical make-up of the VOCs being emitted. Some VOCs are highly carcinogenic and even at that volume should not be release[d] to the public."

- **The emissions calculations in the permit application are not guesses.***

- Grace Contention: The tables in the MDE application form use the word "estimated" in recognition that the answers cannot be based on direct measurement because any unit submitting a "permit to construct" has not been built yet. Grace therefore uses the word "estimated" because that is the appropriate wording on the form.

Community Response: Grace provides estimates because no plant exists yet. We are left to conclude that actual emission levels will not be known until the plant is started and trials are run.

Therein lies a major problem with this project: Grace will run plant trials where emissions could be all over, and possibly outside acceptable levels, with residents sitting in their houses a few meters away and children playing in the streets, all living under the false promise that lab tests translate to plant trials.

- Grace Contention: The emissions are estimated based on laboratory measurements, research into published data on similar equipment, and information directly from the equipment manufacturers (for example the flameless thermal oxidizer).

Community Response: But still these are estimates, based on the best-case scenario and the assumption that laboratory tests will translate to scaled-up operations. That is never the case in practice. At the very least, several plant trials will first be required. Grace intends to do this while ignoring the fact that adults and children live next door, living at the mercy of Grace.

- Grace Contention: The emissions control equipment Grace plans to install has been used consistently in many types of operations for many years, and all the available information from this operating history supports the control efficiencies stated in the permit application.

Community Response: "Emissions control equipment" of the kind that Grace discusses has failed many times, resulting in accidents, fires and explosions, where people have been hurt and the environment polluted. (See for example: [Thermal Oxidizer Fire & Explosion Hazards](#), M Iqbal Essa, T. Ennis, IChemE, Symposium Series No. 148 (2001)).

- **There will be no dioxins in the air emissions.***

- Grace Contention: Grace enumerated all the potential air emissions as required in the Permit to Construct application. Neither Dioxins nor PCBs will be emitted from this process.

Community Response: This statement is based on the estimates provided for just one polymer which Grace is using as a benchmark, polypropylene. Grace

states that it intends to test at least 5 additional polymers, plus another category of polymers listed as simply "others" (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 15). Dioxins and other pollutants are potential emissions from this "others" category.

- **There will be no chemicals or microplastics discharged to groundwater from the research process.***

- Grace Contention: The pilot plant will not generate any process wastewater streams that will be discharged to the site grounds, waterways, or groundwater.

- Grace Contention: All waste materials will be managed in compliance with all applicable laws.

- Grace Contention: The pilot plant will not generate microplastics.

Community Response: Still, process waste will be generated and handled, like in any other chemical operation. This will include the toxic solid catalyst waste. This is not a good picture for residents living just 70 meters away.

- **We are not building a manufacturing or production-scale facility.**

- Grace Contention: The research lab will be built inside an existing building on our property and will process a very small amount of plastic (1 kilogram or 2.2 lbs per hour at most).

Community Response: The yearly figures are 4,000 kilograms of at least six different kinds of plastic polymers (see page 29 of the [MDE application](#)).

- Grace Contention: We realize that calling this project a "pilot plant" in the Air Permit Application has, unfortunately, created the image of a manufacturing plant, when in fact, it is a laboratory at a similar scale to the other 10+ labs on the Columbia campus.

Community Response: It is actually worse than a manufacturing plant. As a pilot plant, it will conduct experiments on a daily basis, where the chemicals, their level, and the process conditions will all be changed regularly in order to learn and optimize the process for potential scale-up. This kind of operation, by its nature, will often have unpredictable consequences. A study done on a pilot pyrolysis plant in Italy showed that in piloting conditions, the hazardous output that is found can be greater than a plant in production since the pilot plant is testing different processes and conditions ([Paladino 0 2021](#)).

- **Thermal oxidizers are state-of-the-art emissions control technology.**

- Grace Contention: Throughout our network, Grace operates several thermal oxidizers because they are recognized state-of-the-art emissions control technology; see [EPA information here](#).

- Grace Contention: Thermal oxidizer fires and explosions cited at other sites have occurred on units that generate flames – ours will be *flameless*.

Community Response: This is not true. The hydrocarbon gases will auto-ignite

at the 1,800 deg F temperature of the incinerator. Accidents will occur anytime there are process deviations, changes in air flow rates, VOC flow rates and composition (Many industrial accident examples available, but see review again: [Thermal Oxidizer Fire & Explosion Hazards](#), M Iqbal Essa, T. Ennis, IChemE, Symposium Series No. 148 (2001).

- Grace Contention: In the unlikely event the unit were to spark a fire, it would be on the scale of a fire in a gas stove in a residential kitchen, not an industrial refinery.

Community Response: It is far from reality to compare this to a little stove fire. Grace will have units running at 1,800 deg F, 750 deg F and 1,200 deg F. All of this while several 55-gal drums of a flammable liquid are produced and warehoused in-house every year (Maryland Department of the Environment [MDE], 2023, [Docket #16-23](#), p. 16).

• **Grace sold the land that is now Cedar Creek to a commercial developer.**

- Grace Contention: Grace sold the land to a commercial developer.
- Grace Contention: The developer subsequently had the property re-zoned by the Howard County Planning Committee as residential.

Community Response: Grace is trying to divorce themselves from the zoning issue. We have confirmed that the developer bought the land from Grace with a contract that was CONTINGENT upon the land getting re-zoned to residential. If the land was not re-zoned, then the deal would surely have fallen through.

• **Throughout the permit process, Grace has provided information as requested by MDE and answered questions that MDE has shared from the community.**

- Grace has made information about the project available to our neighbors via the public meeting and our website (see <https://grace.com/campaign/pilot-project-in-columbia/>).
- Grace Contention: Grace has provided responses to all questions received from MDE to MDE directly; it is our understanding that MDE will make the responses public with their determination on the permit application.

Community Response: Grace did not engage the community ahead of the permit, a step that is strongly recommended by MDE (see below). **To this day, as Grace's VP of Communications admitted in questioning by Councilmember Deb Jung on February 18, Grace has not once engaged the community directly, held a town hall, or contacted local HOAs. Even since the hearing, they have not reached out to the local community.** There are still outstanding questions dated back to summer 2024 that have not been answered by MDE or Grace.

From the Maryland Department of Environment Air Quality Permit to Construct ([MDE](#) accessed 2/26/25):

For applications that are subject to public review:

For applications that are subject to public review, the following information is useful for applicants to consider. Applications subject to public review are listed in COMAR 26.11.02.11 and .13. If you are not sure at the time you are applying for a permit whether public review of your application is required, you can contact the Air Quality Permits Program at 410-537-3230 and seek their advice.

Communicating and engaging the local community as early as possible in your planning and development process is an important aspect of your project and should be considered a priority. Environmental Justice or "EJ" is a movement to inform, involve, and engage communities impacted by potential and planned environmental projects to afford citizens an opportunity to learn about projects and allay any concerns about impacts.

Although some permit applications are subject to a formal public review process prescribed by statute, the Department strongly encourages you to engage neighboring communities outside and well ahead of the formal permitting process. Sharing your plans by way of community meetings, informational outreach at local gatherings or through local faith-based organizations can initiate a rewarding and productive dialogue that will reduce anxiety and establish a permanent link with your neighbors in the community.

All parties benefit when there is good communication. The Department can assist applicants in developing an outreach plan that fits the needs of both the company and the public.

As concerned community members we want to also highlight the following:

The language of the CB11-2025 is in fact general. We do not wish to single out one company. **The fact that it only seems to apply to Grace is due to Grace being a singularly bad faith actor. Allowing them to use this as an excuse sets a bad precedent when it comes to civic responsibility and community stewardship.**

This bill is not regulating air quality. It is plugging a hole in current regulations and their enforcement that would otherwise allow dangerous operations to threaten your citizens' health.

As Howard County grows to become a home for more families and businesses, we hope that CB11-2025 sets a zoning precedent so that residents and commerce can live together harmoniously.

As constituents and engaged voters, we trust you to uphold the values of the Howard County Mission which is to protect public health and safety. As county leaders, we trust that you will vote **YES** for CB11-2025.

Thank you,

Concerned Citizens of Howard County

From: Williams, China
Sent: Wednesday, February 26, 2025 4:16 PM
To: Anderson, Isaiah
Subject: FW: CB11-2025 - Thank you for your sponsorship and support!

Follow Up Flag: Follow up
Flag Status: Flagged

From: Preeta R. Srinivasan <preeta.r.srinivasan@gmail.com>
Sent: Wednesday, February 26, 2025 2:50 PM
To: Jung, Debra <djung@howardcountymd.gov>
Cc: CouncilDistrict4@howardcountymd.gov
Subject: Re: CB11-2025 - Thank you for your sponsorship and support!

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Of course.

Several of us residents received an email today from Council member Rigby stating that she has significant concerns about CB-11 due to singling out of Grace / her stated view that CB-11 is a “special law” (which legal experts in our community disagree with) and saying air quality regulation is in MDE’s authority, not county council’s. These statements are very concerning and seem like excuses, given the language of the bill is general, given this is not air quality regulation but simply a common sense zoning protection, and given that federal funding freezes for MDE, among other things, may limit MDE’s ability to protect us. How can we residents best push back against this line of attack on the bill in the limited time we have left?

Thank you,
Preeta

On Tue, Feb 25, 2025 at 8:38 AM Jung, Debra <djung@howardcountymd.gov> wrote:

Thank you for the kind note.

Deb Jung
Councilmember, District 4
[3430 Court House Dr., Ellicott City, MD 21043](https://www.howardcountymd.gov/3430-Court-House-Dr.-Ellicott-City-MD-21043)
(410) 313-2001

Sign-up for Deb’s District Update [here](#).

From: Preeta R. Srinivasan <preeta.r.srinivasan@gmail.com>
Sent: Monday, February 24, 2025 9:13 PM

To: CouncilDistrict4@howardcountymd.gov <CouncilDistrict4@howardcountymd.gov>

Subject: CB11-2025 - Thank you for your sponsorship and support!

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Ms. Jung,

As a Cedar Creek resident, I am so grateful for your advocacy and support for CB11-2025. It means so much to my family that you are fighting to protect our health and safety. Thank you.

Many of us in the Cedar Creek neighborhood worked hard on compiling the attached reasons and data to support CB11. While I know you support the bill, please feel free to pass it along to others on the council (especially those who said they wanted to see data!) or anyone else who might find it helpful.

Thank you,
Preeta Ragavan Srinivasan
7941 Lawndale Circle

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:16 PM
To: Anderson, Isaiah
Subject: FW: WR Grace Air Permit

Follow Up Flag: Follow up
Flag Status: Flagged

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: dunnbb@verizon.net <dunnbb@verizon.net>
Sent: Tuesday, February 25, 2025 5:58 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Subject: WR Grace Air Permit

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Mr. Yungmann,

I am writing this email because I oppose the W.R. Grace proposal to burn hazardous waste that will negatively impact our community. I have lived various places in Howard County since 1980 and love living here for its beauty, amenities and clean air. I live about a mile away from Grace. I was born and raised in New York City, which suffered from very bad air and water pollution.

For 30 years, I was employed by the United States Environmental Protection Agency (USEPA) and witnessed many cases in which W.R. Grace heavily polluted communities in several areas of the country. The clean-up of these hazardous waste sites by USEPA contractors resulted in massive Federal expenditures, for which Grace did not reimburse the USEPA because it declared bankruptcy. Grace continues to pollute wantonly across the USA, including a site in Baltimore, which it is fighting against the City regarding mitigation.

The Howard County Planning Board unanimously recommended that the County Council develop legislation so that the W.R. Grace project not be implemented so close to residences due to potential hazards and risks for fires, leaks and explosions. That recommendation resulted in CB-11-2025. An independent review conducted for MD House of Delegates Jennifer Terrasa stated that emissions are likely greater than stated by W.R. Grace in its Permit Application to the MD Department of Environment. Grace's application used only one polymer for its calculation purposes, while it most likely would use several polymers.

Chemical recycling plants release pollutants that can be dangerous regardless of the plant's size. Many of these pollutants are dangerous in small amounts. Some of the proposed emissions are highly carcinogenic and should not be released to the public. Grace's analysis focused on very conservative use of the chemicals, though their true operations are expected to be much higher and with additional applications not identified in their proposals. This is corroborated by Scott Purnell, VP of Research and Development (R&D) Refining Technologies at Grace in testimony given last week.

Meanwhile the MD MDE's air monitoring funds are frozen in the current Federal administration, also testified in last week's CB-11-2025 hearings.

Please support the ZRA (CB-11-2025), which would amend the Howard County Zoning Regulations to add R&D Laboratory use to the zoning districts of the Grace operations. It would prohibit such R&D that involve commercial plastic pellets etc. that produce flue gases. The emission of these pollutants requires a MDE permit.

I implore you to vote against W.R. Grace's requests to release the hazardous fumes into our air and to protect our community from potential catastrophic environmental "accidents". Thank-you for your consideration of these matters.

Sincerely,
Bernadette Dunn
6482 South Wind Circle
Columbia, MD 21044

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:19 PM
To: Anderson, Isaiah
Subject: FW: Support CB-11-2025

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: camrodriguez23@gmail.com <camrodriguez23@gmail.com>
Sent: Saturday, February 22, 2025 3:07 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Subject: Support CB-11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Hello,

I am writing today to express my concerns about the W.R. Grace Research & Development center. This company has a bad track record of pollution throughout history, from asbestos to radioactive waste.

The Robinson Nature Center is a treasure, providing the citizens of Howard County recreational and educational value. The W.R. Grace Research and Development center will create pollution and waste via plastic melting.

We are living in a time where so many people in political positions simply don't believe in pollution or climate change, and therefore won't do anything about it and continue loosening regulations on companies like W.R. Grace. Please, do the right thing for Howard County and support CB-11-2025.

Thank You,
Camila Rodriguez

Sent from my iPhone

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:24 PM
To: Anderson, Isaiah
Subject: FW: CB11-2025

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: David Askwith <davidaskwith@verizon.net>
Sent: Monday, February 17, 2025 3:23 PM
To: CouncilDistrict5@howardcountymd.gov
Subject: CB11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Hello Councilman Yungmann,

My wife, daughter and I are Cedar Creek residents. I am also a fellow Republican. I am reaching out to you with hope of your support for CB11-2025. Our community is in a precarious position and we are counting on our elected officials to stand up for our health and safety.

I know there is a lot of political pressure on this Bill. You have an opportunity to show the Democrats that Republicans care about the environment too! Please take a stand for our community. Thank you!!

[Sent from AOL on Android](#)

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:19 PM
To: Anderson, Isaiah
Subject: FW: Hear a mom's plea: Support CB-11-2025

Follow Up Flag: Follow up
Flag Status: Flagged

Karen Knight ~ Special Assistant to David Yungmann Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043

-----Original Message-----

From: Jess Reikowsky <jess.reikowsky@gmail.com>
Sent: Saturday, February 22, 2025 2:31 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Cc: CouncilDistrict5@howardcountymd.gov
Subject: Hear a mom's plea: Support CB-11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Councilmember Yungman:

As a lifelong Glenelg resident and mom to two little boys (ages 9 months and 3 years old) who deserve clean air, I am writing today to urge you to support CB-11-2025. This measure will protect our community and the communities surrounding the W.R. Grace campus from the deleterious health and safety impacts of the company's planned plastic R&D facility. Howard County residents deserve to reap the benefits of clean air and the peace of mind in knowing that their families are not being exposed to ongoing chemical emissions from this planned facility, nor must they live in constant fear of leaks and fires, very real possibilities.

W.R. Grace is planning on installing an incinerator (as determined by the EPA) on its campus next to and in the midst of Howard County communities. This is unacceptable. A project like this does not belong in our residential communities.

Despite Grace's assurances, we are not reassured that the impacts of this facility are negligible. W.R. Grace has demonstrated a careless approach and significant disregard to residents' opposition to this project. Given Grace's terrible track record in polluting communities, residents, employees, towns and surrounding environments (the movie A Civil Action is based on Grace negligence and abuse), coupled with the way in which they have handled this proposed plan, we strongly oppose this project.

We need you to stand up to Grace's lack of regard for our health and safety. I urge to vote in support of CB-11-2025 without any amendments.

I will be keenly watching your vote, which will greatly impact my future voting.

Thank you,
Jessica

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:18 PM
To: Anderson, Isaiah
Subject: FW: VOTE YES ON CB-11-2025

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: jhk1983@aol.com <jhk1983@aol.com>
Sent: Monday, February 24, 2025 9:55 AM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Subject: VOTE YES ON CB-11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear, David Yungmann

I am writing today to urge you to support CB-11-2025. This measure will protect our community and the communities surrounding the W.R. Grace campus from the deleterious health and safety impacts of the company's planned plastic R&D facility. Howard County residents deserve to reap the benefits of clean air and the peace of mind in knowing that their families are not being exposed to ongoing chemical emissions from this planned facility, nor must they live in constant fear of leaks and fires, very real possibilities.

W.R. Grace is planning on installing an incinerator (as determined by the EPA) on its campus next to and in the midst of Howard County communities. This is unacceptable. A project like this does not belong in our residential communities.

Despite Grace's assurances, we are not reassured that the impacts of this facility are negligible. W.R. Grace has demonstrated a careless approach and significant disregard to residents' opposition to this project. Given Grace's terrible track record in polluting communities, residents, employees, towns and surrounding environments (the movie A Civil Action is based on Grace negligence and abuse), coupled with the way in which they have handled this proposed plan, we strongly oppose this project.

We need you to stand up to Grace's lack of regard for our health and safety. I urge to vote in support of CB-11-2025 without any amendments.

I will be keenly watching your vote, which will greatly impact my future voting.

Thank you,

Justin Kaplan

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:17 PM
To: Anderson, Isaiah
Subject: FW: Support to the ZRA CB11-2025

Follow Up Flag: Follow up
Flag Status: Flagged

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: Lily Weiss-Lora <lweisslora@gmail.com>
Sent: Monday, February 24, 2025 4:25 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>; Skalny, Cindy <cskalny@howardcountymd.gov>; Knight, Karen <kknight@howardcountymd.gov>
Subject: Support to the ZRA CB11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

My name is Lily Weiss-Lora and would kindly request your support to the ZRA CB11-2025, I am a resident of Howard County living over 25 years in the Village of River Hill in Columbia, I strongly request for the Howard County Planning Board to pass this ZRA and reject W.R. Grace efforts to build a chemical recycling pilot project in our community.

The National Resources Defense Council (NRDC) states that chemical recycling is a “dangerous solution” that just generates more waste and worsens the environment by releasing hazardous pollutants into our communities and the environment. Chemical recycling doesn’t qualify as recycling by the international standards, but it is touted by the Major petrochemical industry as a solution to the plastic waste crisis.

- 1- Chemical recycling of plastic to fuel, which is what W.R. Grace is proposing to build in our community has a very high energy demand, it requires high operating temperatures and relies on external fuel sources to maintain the process heat, making the plastic to fuel process a very high emitter of CO2 emissions that will endanger public health, safety and welfare by releasing hazardous pollutants into the atmosphere, and the trail doesn’t stop there, further pollution and health risks come from burning the dirty fuel created by the petrochemical output as fuel. In other words, we are incinerating carcinogens and neurotoxicants in our community.
- 2- Chemical recycling of plastic to fuel is a process that is harmful, highly unsafe, misleading and does not solve plastic pollution.
- 3- In addition, Chemical recycling of plastic to fuel, or **pyrolysis** facilities are classified by the EPA as **waste incinerators**, and they are required to meet the Clean Air Act guidelines but are excluded from The Toxics Release Inventory (TRI) reporting requirements. This makes it difficult to assess the full health risks of plastic pyrolysis plants that posed to surrounding communities.

4- Despite these challenges lawmakers are embracing this technology thanks to the massive lobbying from the American Chemical Council and the greed of corporations trying to mislead the public as a sustainability action when it is just a greenwashing term for burning plastic that releases tons of air pollutants into the environment.

Please support this Bill for the future of a greener Columbia and in order to stop any other company from building a chemical recycling facility similar to this one in the future.

Thank you for all your support on this matter.

Lily Weiss-Lora

Resident of River Hill community, Columbia MD

02/24/2025

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:22 PM
To: Anderson, Isaiah
Subject: FW: Please support CB-11-2025

Karen Knight ~ Special Assistant to David Yungmann Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043

-----Original Message-----

From: Jenna Hammer <jennasunday@gmail.com>
Sent: Thursday, February 20, 2025 8:40 PM
To: Dyungman@howardcountymd.gov
Cc: CouncilDistrict5@howardcountymd.gov
Subject: Please support CB-11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Councilman Youngman:

I am writing today to urge you to support CB-11-2025. This measure will protect our community and the communities surrounding the W.R. Grace campus from the deleterious health and safety impacts of the company's planned plastic R&D facility. Howard County residents deserve to reap the benefits of clean air and the peace of mind in knowing that their families are not being exposed to ongoing chemical emissions from this planned facility, nor must they live in constant fear of leaks and fires, very real possibilities.

W.R. Grace is planning on installing an incinerator (as determined by the EPA) on its campus next to and in the midst of Howard County communities. This is unacceptable. A project like this does not belong in our residential communities.

Despite Grace's assurances, we are not reassured that the impacts of this facility are negligible. W.R. Grace has demonstrated a careless approach and significant disregard to residents' opposition to this project. Given Grace's terrible track record in polluting communities, residents, employees, towns and surrounding environments (the movie A Civil Action is based on Grace negligence and abuse), coupled with the way in which they have handled this proposed plan, we strongly oppose this project.

We need you to stand up to Grace's lack of regard for our health and safety. I urge to vote in support of CB-11-2025 without any amendments.

We moved our family to Howard County from Baltimore city in 2021 because it was known as a great place to raise a family. I am very worried about the effects of this plant on the health of our community but specifically

my 10 month old, 3 year old and 5 year old. We deserve to feel confident in the health of our home environment !

I will be keenly watching your vote, which will greatly impact my future voting.

Thank you,
Jenna and Michael Hammer
Sykesville 21784

From: Mustafa Omarzad <mustafa.omarzad@gmail.com>
Sent: Monday, February 24, 2025 3:09 PM
To: lewalsh@howardcountymd.gov
Cc: CouncilDistrict1@howardcountymd.gov
Subject: I Strongly Support CB 11-2025(ZRA-211) _ WR Grace_Columbia MD

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Council Member Liz Walsh,

My name is Mustafa Omarzad. I am a resident of Cedar Creek submitting this written testimony in support of CB 11-2025(ZRA-211).

I am living with my wife and three kids 12, 9, and 7. Our house was built in 2021 in Cedar Creek community at 7511 Overview Terr Columbia, MD.

I am writing today to urge you to support CB-11-2025. This measure will protect our community and the communities surrounding the W.R. Grace campus from the deleterious health and safety impacts of the company's planned plastic R&D facility. Howard County residents deserve to reap the benefits of clean air and the peace of mind in knowing that their families are not being exposed to ongoing chemical emissions from this planned facility, nor must they live in constant fear of leaks and fires, very real possibilities.

W.R. Grace is planning on installing an incinerator (as determined by the EPA) on its campus next to and in the midst of Howard County communities. This is unacceptable. A project like this does not belong in our residential communities.

we are concerned about the risks of fire, leaks, and toxic emissions to our community (the equipment proposed for use in this facility is prone to fires)

Even small amounts of chemicals can impact health.

Despite Grace's assurances, we are not reassured that the impacts of this facility are negligible. W.R. Grace has demonstrated a careless approach and significant disregard to residents' opposition to this project. Given Grace's terrible track record in polluting communities, residents, employees, towns and surrounding environments (the movie A Civil Action is based on Grace's negligence and abuse), coupled with the way in which they have handled this proposed plan, we strongly oppose this project.

We need you to stand up to Grace's lack of regard for our health and safety. I urge you to vote in support of CB-11-2025 without any amendments.

I will be keenly watching your vote, which will greatly impact my future voting.

Thank you,
Mustafa Omarzad

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:19 PM
To: Anderson, Isaiah
Subject: FW: Urgent

Follow Up Flag: Follow up
Flag Status: Flagged

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: Shari Chase <pgxtests@gmail.com>
Sent: Saturday, February 22, 2025 8:08 PM
To: CouncilDistrict5@howardcountymd.gov; guy.guzzone.district@senate.state.md.us; Yungmann, David <dyungmann@howardcountymd.gov>
Subject: Urgent

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Councilman,

I am Shari Chase a resident in District 5 a mile from WR Grace. Under no circumstances should hte3y be allowed to have a bottle or plastics processing plant in a residential area as they touch and are in. Their history of poisoning and killing people are on record and to illuminate their past carelessness watch Erin Brokovich, and the poisoning of the surrounding land we live in buy them in 1990 and 1980's.

They border the Middle Patuxent and there is no way they can avoid affecting this important water source from affecting all that the water flows.

Processing plants put VOCs and other carcinogens in the air.. We have contacted Ronert Kennedy and were told to report back as well as my dear friend Senator Hoyer and we will demand a cease and desist if. an approval is extended. .

Please be considerate of our lives and health.

I thank you and look forward to a positive response.

Please note as of late we have smelled burning plastics and my sons and I have had resulting respiratory effects.

Warmest Regards

Shari Chase
301-537-2747
pgxtests@gmail.com
Towering Oak Path
Columbia, MD 21044

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:16 PM
To: Anderson, Isaiah
Subject: FW: Proposed Air Permit for W.R. Grace

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: William Dunn <williamdunn56@yahoo.com>
Sent: Tuesday, February 25, 2025 6:39 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Subject: Proposed Air Permit for W.R. Grace

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Councilman Yungmann,

I am writing to you because I oppose the W.R. Grace proposal to burn hazardous waste that will negatively impact our community. I have lived various places in Howard County since 1987 and love living here for its beauty, amenities and clean air. I live about a mile away from Grace. I was born and raised in the Philadelphia, which was very badly polluted.

For 18 years, I worked for the United States Environmental Protection Agency (USEPA) and saw many cases in which W.R. Grace heavily polluted communities across the country. The clean-up of these hazardous waste sites by USEPA contractors resulted in massive Federal expenditures, for which Grace did not reimburse the USEPA because it declared bankruptcy. Grace continues to pollute wantonly across the USA, including a site in Baltimore, which it is fighting against the City regarding mitigation.

The Howard County Planning Board unanimously recommended that the County Council develop legislation so that the W.R. Grace project not be implemented so close to residences due to potential hazards and risks for fires, leaks and explosions. That recommendation resulted in CB-11-2025. An independent scientific review conducted for MD House of Delegates Jennifer Terrasa stated that emissions are likely greater than stated by W.R. Grace in its Permit Application to the MD Department of Environment (MDE). Grace's application used only one polymer for its calculation purposes, while it most likely would use several polymers.

Chemical recycling plants release pollutants that can be dangerous regardless of the plant's size. Many of these pollutants are dangerous in small amounts. Some of the proposed emissions are highly carcinogenic and should not be released to the public. Grace's analysis focused on very conservative use of the chemicals, though their true operations are expected to be much higher and

with additional applications not identified in their proposals. This is corroborated by Scott Purnell, VP of Research and Development (R&D) Refining Technologies at Grace in testimony given last week.

Meanwhile the MD MDE's air monitoring funds are frozen in the current Federal administration, also testified in last week's CB-11-2025 hearings.

Please support the ZRA (CB-11-2025), which would amend the Howard County Zoning Regulations to add R&D Laboratory use to the zoning districts of the Grace operations. It would prohibit such R&D that involve commercial plastic pellets etc. that produce flue gases. The emission of these pollutants requires a MDE permit.

I implore you to vote against W.R. Grace's requests to release the hazardous fumes into our air and to protect our community from potential catastrophic environmental "accidents". Thank-you for your consideration of these matters.

Sincerely,

William Dunn
6482 South Wind Circle
Columbia, MD 21044

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:21 PM
To: Anderson, Isaiah
Subject: FW: Support ZRA CB11-2025

Follow Up Flag: Follow up
Flag Status: Flagged

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: Yemisi Aina <yemi.plays.guitar@gmail.com>
Sent: Friday, February 21, 2025 1:01 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Cc: CouncilDistrict5@howardcountymd.gov
Subject: Support ZRA CB11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Councilman Yungmann:

I am writing today to urge you to support CB-11-2025. This measure will protect our community and the communities surrounding the W.R. Grace campus from the deleterious health and safety impacts of the company's planned plastic R&D facility. Howard County residents deserve to reap the benefits of clean air and the peace of mind in knowing that their families are not being exposed to ongoing chemical emissions from this planned facility, nor must they live in constant fear of leaks and fires, very real possibilities.

W.R. Grace is planning on installing an incinerator (as determined by the EPA) on its campus next to and in the midst of Howard County communities. This is unacceptable. A project like this does not belong in our residential communities.

Despite Grace's assurances, we are not reassured that the impacts of this facility are negligible. W.R. Grace has demonstrated a careless approach and significant disregard to residents' opposition to this project. Given Grace's terrible track record in polluting communities, residents, employees, towns and surrounding environments (the movie A Civil Action is based on Grace negligence and abuse), coupled with the way in which they have handled this proposed plan, we strongly oppose this project.

We need you to stand up to Grace's lack of regard for our health and safety. I urge to vote in support of CB-11-2025 without any amendments.

I will be keenly watching your vote, which will greatly impact my future voting.

Thank you,
Yemisi Aina

From: Knight, Karen
Sent: Thursday, February 27, 2025 3:20 PM
To: Anderson, Isaiah
Subject: FW: CB-11-2025

Follow Up Flag: Follow up
Flag Status: Flagged

*Karen Knight ~ Special Assistant to David Yungmann
Howard County Council, District 5
3430 Court House Drive
Ellicott City, MD 21043*

From: Zak Omar <zakiomar20@gmail.com>
Sent: Saturday, February 22, 2025 2:16 PM
To: Yungmann, David <dyungmann@howardcountymd.gov>
Subject: CB-11-2025

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear councilman Yungmann,

I am writing today to urge you to support CB-11-2025. This measure will protect our community and the communities surrounding the W.R. Grace campus from the deleterious health and safety impacts of the company's planned plastic R&D facility. Howard County residents deserve to reap the benefits of clean air and the peace of mind in knowing that their families are not being exposed to ongoing chemical emissions from this planned facility, nor must they live in constant fear of leaks and fires, very real possibilities.

W.R. Grace is planning on installing an incinerator (as determined by the EPA) on its campus next to and in the midst of Howard County communities. This is unacceptable. A project like this does not belong in our residential communities.

Despite Grace's assurances, we are not reassured that the impacts of this facility are negligible. W.R. Grace has demonstrated a careless approach and significant disregard to residents' opposition to this project. Given Grace's terrible track record in polluting communities, residents, employees, towns and surrounding environments (the movie A Civil Action is based on Grace negligence and abuse), coupled with the way in which they have handled this proposed plan, we strongly oppose this project.

We need you to stand up to Grace's lack of regard for our health and safety. I urge to vote in support of CB-11-2025 without any amendments.

I will be keenly watching your vote, which will greatly impact my future voting.

Thank you,
Zaki Omar

From: Aidan Morrell <Aidan.Morrell@hhmhotels.com>
Sent: Saturday, March 1, 2025 12:42 PM
To: tellhoco; Rigby, Christiana
Cc: Jones, Opel; Walsh, Elizabeth; Jung, Debra; CouncilDistrict3@howardcountymd.gov; CouncilDistrict2@howardcountymd.gov; CouncilMail; CouncilDistrict5@howardcountymd.gov; CouncilDistrict4@howardcountymd.gov
Subject: Re: W.R. Grace CB11 Testimony

Follow Up Flag: Flag for follow up
Flag Status: Flagged

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Ms. Rigby,

To the extent of the concerns you raised, I would strongly encourage you and the other council members to consult your legal counsel, as any impartial attorney not representing W.R. Grace would quickly dispel any concerns you have as to the constitutionality of this legislation. While I appreciate your careful review of all perspectives, I worry you've fallen victim to a colorful but hollow and unsupported claim by W.R. Grace's attorney. Claims such as the one now advanced by W.R. Grace have been definitively decided by Maryland courts.

Specifically, with respect to W.R. Grace's "special law" argument, your final decision should be very easy. The claim that the proposed amendment could in any way constitute a "special law" is an impressive argument from a very adept attorney whose client would benefit greatly from the committee's mistaken belief that the Maryland constitution confers an absolute right to pollute so long as the putative polluter forms a specific plan to do so prior to the enactment of responsive legislation. But an impressive argument is all it is: Grace's interpretation of the Maryland Constitution is patently incorrect.

The substance of Grace's dubious claim appears to be that the law would prohibit a particular plan by one particular company, and that it is thus a special law. **But the Court of Appeals of Maryland rejected an identical argument long ago by a company who claimed a law that prevented them from dredging in wetlands was a special law.** *Potomac Sand and Gravel Co. v. Governor of Maryland*, 266 Md. 358, (Md. App. Ct. 1972):

"[The dredging prohibition] resembles a public local law more than a special law. It does not provide relief of a particular named party. It is true that Potomac Company may be the only party affected by Chapter 792, but if others wished to dredge the wetlands of Charles County, they too would be prohibited from doing so."

Similarly, even assuming for purpose of argument that W.R. Grace is the *only* company the proposed amendment would currently impact, it is not a special law because anyone else wishing to fill local air with byproducts of plastic combustion "too would be prohibited from doing so." It does not follow that the proposed legislation here in any way "targets" W.R. Grace or that the legislation would not apply equally to any other company that may seek to engage in similar conduct to that which W.R. Grace now seeks to pursue.

Of the cases addressing the Maryland Constitution's special law provision, *Potomac Sand* is far-and-away the most similar set of facts to the present ones. The court's summary rejection of the special law there should end

the inquiry here. But, a more granular analysis undermines the argument just as thoroughly. Specifically, courts look to six factors to determine whether a law constitutes a “special law.” *Cities Service Co. v. Governor of Maryland*, 290 Md. 553 (1981). “No one factor is conclusive,” though in this case it doesn’t matter, as all six cut against Grace.

(1) Whether the underlying purpose of the enactment was actually intended to benefit or burden a particular member or members of a class instead of an entire class:

A law that benefits the community as a whole to W.R. Grace’s detriment is presumptively not a special law, because “[l]aws that confer a benefit, rather than a detriment, on a single party at the time of its enactment are looked upon more harshly.” *Howard County v. McClain*, 254 Md. App. 190, 200 (2022). In particular, laws that work to the detriment of one company in one instance, but would prohibit the same conduct on the part of anyone who wished to engage in it, are not special laws. *Id.*, citing *Potomac Sand*, 266 Md. at 379.

(2) Whether particular individuals or entities are identified in the statute:

The proposed regulation does not name W.R. Grace or any other party.

(3) The substance and “practical effect” of an enactment:

As one might foresee by this point in the discussion, this factor means more than simply that a regulation or law has the practical effect of preventing a particular party from doing something it wants to do. It means that the wording or circumstances of a law have the effect that it might as well name a particular party. In *Cities Serv. County*, the regulation in question was specifically crafted to benefit an absurdly narrow category of people, specifically, those who were “in Howard County, [were] a conditional use private academic school, and [held] an exclusive use easement adjacent to [their] property,” all of which had the effect it was “virtually inconceivable,” another party would avail itself to the regulation’s benefit. 254 Md. App. at 201. Similarly, in *Cities Serv. Co.*, the relevant statute include qualifying dates within which a party’s activities needed to fall to claim its benefit—dates whose effect was “virtually the same as if the statute had named Montgomery Ward.” 290 Md. at 674. The present amendment and surrounding circumstances include nothing that makes it comparable to either of these cases. It should also be noted, somewhat ironically, that even in the sole case cited by Tom Cole to support his “special law” argument (*Howard County v McClain*), the Court began its opinion by noting that the “case present[ed] an uncommon occurrence—a successful constitutional challenge to a zoning authority’s textual amendment.” That case shared no similarities to the current at issue at hand and all of the factors favoring a finding of a special law in that matter lean instead toward a finding of validity under the current fact pattern.

(4) If a particular individual or business sought and received special advantages from the legislature, or if other similar individuals or businesses were discriminated against by the legislation:

Ironically, this factor would likely apply in the reverse scenario: if W.R. Grace were seeking an amendment to permit expand its rights to pollute. “The purpose of [the Maryland Constitution’s “special law provision] is to prevent one who has sufficient influence to secure legislation from getting an undue advantage over others....” *Md. Dep’t of the Env’t v. Days Cove Reclamation Co.*, 200 Md. App. 256, 265 (2011). But the situation is the opposite: a group of concerned citizens collectively seeking protection from a nearly \$5 Billion, multinational corporation who attempting to leverage this influence to transform Maryland’s legal system into a conduit for its toxic activities within the state.

(5) The public need and public interest underlying the enactment, and the inadequacy of general law to serve the public need or public interests:

The public needs protection from a handful of bad actors who seek to trade public safety for personal gain. W. R. Grace's reckless plan to form a plastic-burning operation near several hundred family homes is a patent instance of this need. To the extent current law and regulation does not prohibit these activities (an issue that is the subject of parallel litigation efforts), it is inadequate.

(6) Whether the legislative enactment is arbitrary and without any reasonable basis:

Proponents of the amendment have provided an overwhelming compendium of independent, peer reviewed research concluding that W.R. Grace's activities will likely have catastrophic environmental results for Maryland residents. W.R. Grace responds with its own research—research fraught with conflicts of interest and lacking any meaningful indicia of impartiality or scientific credibility.

The above notwithstanding, even if none of the above were true, and this were in fact a special law, it would still be constitutional. Contrary to W.R. Grace's assertion, the Maryland Constitution does not in fact prohibit special laws. "[E]ven some special laws, as the Court of Appeals has explained, do not fall within the constitutional prohibition, provided that the legislation addresses special evils with which existing general laws are incompetent to cope." *Maryland Dept. of the Environment*, 200 Md. App. at 281, quoting *Jones v. House of Reformation*, 176 Md. 43, 55-56, 3 A.2d 728 (1939). The court in *Maryland Dept. of the Environment* court found that, to the extent the prohibition on landfills adjacent to waterways was a special law, it was constitutionally permissible to address the "special evil" of potential contamination in waterways. The court would find the same thing with respect to the "special evil" of W.R. Grace's release of airborne toxins into residential neighborhoods.

Switching gears to another point you raised—you mentioned deferring to the MDE as the appropriate regulatory body responsible for evaluating air quality. As I believe has been noted by others, this shows a fundamental misunderstanding of MDE's role. While the MDE is responsible for setting *broad minimum thresholds* that it can apply to an incredibly diverse group of industries (i.e., tire factories, airports, etc.), it is the local authority that is responsible for determining whether, even where an organization can satisfy these bare minimum thresholds, such use is appropriate in certain areas, such as abutting a neighborhood, a school or a hospital. I would implore you not to punt on your responsibility to make this assessment, as that authority should not—and cannot—be delegated elsewhere.

I am not sure your mind can be changed at this stage as the merits of W.R. Grace's "special law" argument are so weak that I can only surmise the real concern is not whether this legislation is in fact constitutional, but whether or not the County Council is willing to withstand a potential challenge by W.R. Grace to the legislation. I can understand the concern, and while your duties shouldn't be dictated by a fear of litigation (but instead should be guided by what actually *is* the right thing to do), even to the extent the County Council is more fearful of legal challenges from W.R. Grace than it appears to be of the citizens of Howard County, I would note that not only would any such challenge by W.R. Grace fail, but as an issue of "law" more so than an issue of "fact", any potential challenges by W.R. Grace could be dispensed with early in proceedings without prolonged litigation and with limited cost to the County. I frankly do not foresee W.R. Grace even believing in its claim enough to challenge this, but the fact remains that if they chose to do so, any such claim would quickly be extinguished.

Please, do the right thing and do not cling to the unsupported arguments W.R. Grace has advanced as a justification to sit idly by here while this project proceeds. You have an opportunity to be a force for good, and a failure to act here will not be looked upon favorably in the eyes of this County's history.



AIDAN MORRELL
SENIOR LEGAL COUNSEL

C. 602.999.9404
O. 215.238.1046

HHMHOTELS.COM

On Fri, Feb 28, 2025 at 1:21 PM <tellhoco@howardcountymd.gov> wrote:

Good Afternoon,

Thank you to everyone who testified in support of CB11, either in person, virtually, or through written submissions. Your engagement in the legislative process is essential and makes local government work its best.

I strongly agree that the proposed facility at W.R. Grace should not be permitted to continue as proposed. I support this bill and want to strengthen protections for the community. Specifically, I put forward [Amendment 1](#) clarifying that any reduction of buffer space would affect its status as a non-conforming use in its current location. I believe that this is the best way to protect the health and safety of the community both in Cedar Creek and beyond.

CB11 is expected to be voted on this Monday, March 3 at 7pm during the legislative session. These meetings are open for the public to attend in person at the George Howard Building (3430 Court House Drive, Ellicott City) or [virtually](#).

Thank you for your advocacy. We are hopeful that our collective efforts bring about a positive result for the community.

In Service,

Liz Walsh
Howard County Council, District 1
Council Chair
[410.313.2001](tel:410.313.2001)

3430 Court House Drive
Ellicott City, MD 21043

Ref:MSG5812227

From: Paul Farragut <paulfarragut@outlook.com>
Sent: Sunday, March 2, 2025 8:16 PM
To: CouncilMail
Subject: Plastic Recycling

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Councilmembers,

I consider myself an environmentalist and one of the greatest challenges we face is finding ways to turn used plastic into new useful products. Sadly, much of the plastic we put in our recycling bins is burned or land filled because there is no way of converting into an economically viable product. Conducting research to do so is of paramount importance. I understand the research facility at WR Grace, in my old council district, is planning such an effort and the proposal has raised some concern by residents. Frankly, I don't understand their concern given Maryland's strong environmental regulations. With cuts in the federal workforce that is going to have negative economic impacts on our County and State, we should be looking for new economic opportunities for scientists and other employees. I strongly oppose any attempt to discourage work on this important environmental issue.

Thank You

Paul and Joan Farragut
3602 Ligon Road
Ellicott City 21042
pjfarragut@aol.com

From: Ravi Reddy <ravireddy8@gmail.com>
Sent: Sunday, March 2, 2025 12:07 PM
To: CouncilMail
Subject: My Testimony

Follow Up Flag: Flag for follow up
Flag Status: Flagged

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

My name is Ravi Reddy, and my wife and I relocated to Cedar Creek three years ago from Framingham, a town renowned for its Heart Study, which has been ongoing for 78 years. This study is dedicated to identifying the common factors contributing to cardiovascular disease. We lived in Framingham for 44 years before moving to Columbia, Maryland, to assist our daughter, who was expecting twins. Despite the higher cost, we chose to purchase a townhouse across from our daughter's home in Cedar Creek, drawn by the reputation of Columbia, Howard County, as one of the best places to live in the United States.

I write to you today as a senior citizen, driven by a deep concern rooted in a tragic industrial disaster that occurred near my hometown in December 1984—the Bhopal gas leak. A massive release of methyl isocyanate (MIC), a highly toxic chemical, from a Union Carbide pesticide plant in Bhopal, India, resulted in the deaths of thousands and left many more with chronic health issues, the effects of which continue to afflict subsequent generations. This disaster was entirely man-made and could have been avoided.

In light of this, I urge that any industrial plants producing hazardous pollutants be located far from residential areas to protect communities from the devastating effects of such accidents.

Thank you for allowing me the opportunity to express my concerns. I am in support of CB11-2025.

Sincerely,

Ravi Reddy

7664 Cross Creek Drive

Columbia, MD 21044

From: Kurt Schwarz <krschwa1@verizon.net>
Sent: Tuesday, March 4, 2025 3:02 PM
To: CouncilMail
Cc: Ball, Calvin; Vanessa Delegate Atterbeary; pam.guzzone@house.state.md.us; jen.terrasa@house.state.md.us; guy.guzzone@senate.state.md.us; MD03SEIMA@mail.house.gov; SenatorVanHollen@vanhollen.senate.gov; Alsobrooksdonotreply@alsobrooks.senate.gov; Kurt Schwarz
Subject: CB-11 Vote

Follow Up Flag: Follow up
Flag Status: Flagged

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

March 4, 2025

Dear Members of Howard County Council:

I was very disappointed at the outcome of the vote for CB-11. I have a few points to make in response to those who voted against it.

Both Dr. Jones and Mr. Yungmann spoke at length about not being Subject Matter Experts (SME), and that this somehow would not allow them to adequately evaluate the bill. This is, at best, disingenuous, and, at worst, willful ignorance. Legislators all across the United States and abroad generally are not SMEs on the various issues that they legislate. They study, consider opposing viewpoints, and hopefully select the view which best comports with truth, science, and the public good. That apparently was not the case with Dr. Jones and Mr. Yungmann.

It was claimed several times that the issue was more properly dealt with the Maryland Department of Environment (MDE) and/or Department of Planning and Zoning (DPZ). They failed to note that MDE already ruled over the summer that the amounts for pollutants to be created by Grace were below MDE's thresholds for action. One failure of emissions monitoring is generally limited to a single source. No account is made for cumulative effects, by multiple polluters. The Grace emissions will be on top of emissions already in the air.

My understanding is the DPZ has also ruled in Grace's favor, approving a non-conforming use. Of course, a non-conforming use would seem to inherently be a zoning violation, but I guess zoning can be willy-nilly put aside when needed.

Ms. Rigby was most concerned about legal issues, that the bill would result in lawsuits, the bill was spot-zoning, etc. and that the bill was clearly directed at Grace. My understanding was the amendments put forward by Ms. Jung and Ms. Walsh, removed the overt Grace references, and ostensibly the litigation threat. It was still argued that everyone would know Grace was the target. That was unavoidable, in that only Grace is proposing such a project. This never would have come up, had Grace not suggested it.

The opponents were asked numerous times to provide their own amendments. And yet, none were offered. If there was a genuine interest in protecting the health of our citizens and air quality, then amendments to allay the concerns of the opponents should have been offered.

In short, MDE, DPZ, and now County Council have declined to stop this project, and protect our air quality and public

health. Who, then, will protect our air, and health?



Kurt Schwarz
7329 Wildwood Court
Columbia, MD 21046
krschwa1@verizon.net
443-538-2370

CC:
Howard County Executive Calvin Ball
Delegate Vanessa Atterbury
Delegate Pam Guzzone
Delegate Jen Terassa
Senator Guy Guzzone
Representative Sarah Elfreth,
Senator Chris Van Hollen
Senator Angela Alsobrooks

From: rday2793@everyactioncustom.com on behalf of Riley Thomas <rday2793@everyactioncustom.com>
Sent: Friday, March 7, 2025 11:37 AM
To: CouncilMail
Subject: Support CB11-2025 for a safe buffer between WR Grace and surrounding neighborhoods

Follow Up Flag: Follow up
Flag Status: Flagged

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Dear Howard County Council,

As a Marylander, I'm deeply concerned by W.R. Grace's proposed "advanced recycling" pilot plant. This plant would spew carcinogenic air pollution just 70 meters from local homes in the Cedar Creek neighborhood of Columbia, Maryland.

Let's be clear. "Advanced recycling" is neither advanced nor recycling. This is just a misleading term for burning plastic waste and turning our plastic pollution problem into an air pollution problem. Read more about this harmful practice here:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.momscleanairforce.org%2Fresources%2Fchemical-recycling-101%2F&data=05%7C02%7Cianderson%40howardcountymd.gov%7C49218bbb17f845ade13808dd5d964b01%7C0538130803664bb7a95b95304bd11a58%7C1%7C0%7C638769622428033312%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIiIAiOiJXaW4zMilslkFOljoiTWFpbCIsIlldUIjoyfQ%3D%3D%7C40000%7C%7C%7C&sdata=vppz2uHY0Jy6GKnYqZ8JWyUTByWQTx0eUqGQDotoudA%3D&reserved=0>

I urge you to support CB11-2025 to ensure a safe buffer between corporations like W.R. Grace conducting research and development (R&D) and residential neighborhoods.

This proposed facility not only will spew cancerous air pollution, but also is susceptible to fires, explosions, accidents, leaks, and more due to its experimental nature. Residents must be protected from these potential catastrophes by ensuring a safe buffer.

It is crucial that the Howard County Council listens to concerned community members and holds W.R. Grace accountable to public health standards. Please do not set the precedent that chemical companies and serial polluters like W.R. Grace can freely pollute and harm our communities. If this can happen in Cedar Creek, it can happen anywhere. Please protect Maryland families and keep our state safe.

Sincerely,
Riley Thomas
1505 Ingleside Ave Gwynn Oak, MD 21207-4946 rday2793@gmail.com